

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

REMBRANDT TECHNOLOGIES, LP,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	C.A. No. 06-731-GMS
FOX ENTERTAINMENT GROUP, INC., and	)	
FOX BROADCASTING COMPANY,	)	
	)	
Defendants.	)	

**PLAINTIFF'S REPLY TO COUNTERCLAIMS  
AND DEMAND FOR JURY TRIAL**

Plaintiff Rembrandt Technologies, LP. ("Rembrandt") respectfully submits this reply to the counterclaims of defendants Fox Entertainment Group, Inc. and Fox Broadcasting Company ("Defendants"). Rembrandt's responses to the numbered paragraphs of Defendants' counterclaims are set forth below, and Rembrandt hereby denies each and every allegation in Defendants' counterclaims that is not specifically admitted or otherwise responded to herein.

**PARTIES**

1. Admitted.
2. Admitted.
3. Admitted.

**JURISDICTION AND VENUE**

4. Rembrandt admits that Defendants purport to seek a declaratory judgment pursuant to 28 U.S.C. §§ 2201 and 2202, and that Defendants have alleged that their counterclaims arise under the Patent Laws of the United States and that this Court has

jurisdiction over such counterclaims under 28 U.S.C. §§ 1331 and 1338(a), but Rembrandt denies that Defendants are entitled to the relief sought thereunder or to any relief whatsoever.

5. Admitted.

**COUNT ONE**

**Declaratory Judgment Of Non-Infringement**

6. Rembrandt incorporates by reference its responses to paragraphs 1-5 of the counterclaims above as if set forth in full herein.

7. Admitted.

8. Denied.

**COUNT TWO**

**Declaratory Judgment Of Invalidity**

9. Rembrandt incorporates by reference its responses to paragraphs 1-8 of the counterclaims above as if set forth in full herein.

10. Admitted.

11. Denied.

**DEFENSES**

Rembrandt asserts the following defenses to the allegations contained in Defendants' counterclaims, but reserves the right to amend this reply to assert additional defenses as they become known through the course of discovery.

**FIRST DEFENSE**

Defendants' counterclaims fail to state a claim upon which relief can be granted.

**DEMAND FOR JURY TRIAL**

Rembrandt hereby respectfully requests a jury trial on all issues so triable.

**PRAYER FOR RELIEF**

WHEREFORE, Rembrandt respectfully requests: (i) that judgment be entered in its favor, and against Defendants, on Defendants' counterclaims, and that Defendants not be awarded any relief in connection therewith; and (ii) that it be awarded all the relief sought in the Prayer for Relief of its complaint, which is incorporated herein by reference.

ASHBY & GEDDES

*/s/ Steven J. Balick*

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